

The Honorable Marc Barreca
Chapter 7
Hearing Date: January 25, 2023
Hearing Time: 10:00 a.m.
Place: Via ZoomGov
Response Due: January 18, 2023

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:
TIMOTHY DONALD EYMAN,
Debtor.

| No. 18-14536

**TRUSTEE'S MOTION FOR APPROVAL OF
INTERIM DISBURSEMENT TO
ADMINISTRATIVE CLAIMANTS AND PRIOR
CHAPTER PROFESSIONALS**

COMES NOW Trustee Virginia A. Burdette, ("Trustee"), and moves this Court for the entry of an Order Approving an Interim Disbursement to Administrative Claimants and Prior Chapter Professionals, stating as follows:

This case was filed under Chapter 11 of the United States Bankruptcy Code on November 28, 2018. The case was converted to Chapter 7 on December 17, 2021, shortly thereafter, I was appointed Chapter 7 Trustee.

Orders have been entered awarding First, Second, Third, Fourth, Fifth & Final Compensation to Richard Sanders & Goodstein Law Group, PLLC (“GLG”) [ECF Docket Numbers: 242, 294, 316, 347, and 439]. According to the Declaration of Carolyn Lake filed with GLG’s Amended Proof of Claim No. 5, and the Trustee’s review, the unpaid balance of GLG’s Chapter 11 administrative expense fee remaining is \$328,114.79.

**TRUSTEE'S MOTION FOR APPROVAL OF
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Virginia A. Burdette
Chapter 7 Trustee
P.O. Box 16600
Seattle, WA 98116
Phone: (206) 441-0203

1 An Order has been entered granting compensation and allowance as an administrative expense to
2 Vortman & Feinstein on May 26, 2022, [ECF Docket No. 462]. The current balance due and owing is
3 \$8,112.50.

4 Pursuant to Court Order dated December 22, 2021, [ECF Docket No. 422], Thomas S. Linde and
5 Schweet, Linde & Coulson, PLLC was employed as General Counsel for the Trustee in this case.

6 Pursuant to Court Order dated February 11, 2022, [ECF Docket No. 437], Kary Krismer, of John
7 L. Scott, Inc. was employed as Realtor to provide valuation services for the Trustee in this case.

8 Pursuant to Court Order dated April 6, 2022, [ECF Docket No. 454], Richard N. Ginnis, CPA
9 was employed as Accountant for Trustee in this case.

10 An Order has been entered granting first interim compensation to Thomas S. Linde and Schweet,
11 Linde & Coulson, PLLC on September 22, 2022 [ECF Docket No. 490] for fees in the amount of
12 \$163,727.50 and expenses in the amount of \$7,272.44 for a total of \$163,727.50. This amount was
13 disbursed by check on September 23, 2022.

14 Thomas S. Linde and Schweet, Linde & Coulson, PLLC have noted for hearing on January 11,
15 2023 at 10:00 A.M, their second interim fee application in the amount of \$13,195.50 for fees incurred,
16 plus reimbursement of expenses in the amount of \$25.50 for a total of \$13,221.00.

17 The Trustee has also noted for hearing on January 11, 2023 at 10:00 A.M. the interim fee
18 application of her accountant, Richard Ginnis, CPA for fees in the amount of \$1,141.00, and
19 reimbursement of expenses in the amount of \$7.00, totaling \$1,148.00.

20 Additionally, the Trustee has also noted for hearing on January 11, 2023 at 10:00 A.M. the
21 interim fee application of herself in the amount of \$31,909.09 for Trustee Fees incurred, plus
22 reimbursement of expenses in the amount of \$32.62 for a total of \$31,941.71.

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24 TRUSTEE'S MOTION FOR APPROVAL OF
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1 Kary Krismer, of John L. Scott, Inc. incurred fees in the amount of \$0.00.
2

3 The Trustee currently holds approximately \$737,496.92 in unencumbered funds collected from
4 various assets. Additional funds are expected to be collected from the Estate's interest in a claim
5 regarding the proceeds of a loan made by the Debtor to Permanent Offense ("P.O. Claim") pending
6 response to demands made by the Trustee via her Counsel. The case has been pending since November
7 28, 2018 and a Trustee's Final Report is not likely until the P.O. Claim is fully administered. An
8 accounting of the disposition of all property is attached hereto as Form 1. An itemized statement of all
9 receipts and disbursements administered to date by the Trustee is attached hereto as Form 2.

10 The Trustee is continuing her administration of the bankruptcy Estate. As there are sufficient
11 funds on hand for an interim disbursement to administrative claimants and professionals, the Trustee is
12 requesting approval of an interim disbursement as follows:

13 **ADMINISTRATIVE AND PROFESSIONAL CLAIMS**

Claimant	Fees	Expenses	Net Pay
Virginia A. Burdette, Chapter 7 Trustee	\$31,909.09	\$32.62	\$31,941.71
United States Trustee	\$249.58	N/A	\$249.58
Thomas Linde, Schweet Linde & Coulson	\$13,195.50	\$25.50	\$13,221.00
Richard N. Ginnis, CPA	\$1,141.00	\$7.00	\$1,148.00
Goodstein Law Group, PLLC	\$328,114.00	N/A	\$328,114.00
Vortman & Feinstein	\$8,112.50	N/A	\$8,112.50
TOTAL PROPOSED PAYMENT TO ADMIN. AND PROFESSIONAL CLAIMS: \$382,786.79			

22 Based on the foregoing, the Trustee requests that the Court enter an Order authorizing the
23 Trustee to make an interim disbursement of \$382,786.79 to claimants set forth above.

24 DATED this 22nd day of December, 2022.

25 */s/ Virginia A. Burdette*

26 Virginia A. Burdette, WSBA #17921
27 Chapter 7 Trustee

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